

*Damages.*—The recovery of damages by a husband for the loss of his wife's services on account of personal injuries is held, in *Selleck v. Janesville* (Wis.) 47 L.R.A. 691, not to be limited to the proved money value of her services as a hired servant, but to include the loss or impairment of his right to conjugal society and assistance.

*Bicycle Law.*—Bicycles are held, in *Taylor v. Union Traction Co.* (Pa.) 47 L.R.A. 289, not to be within the meaning of an ordinance giving vehicles a right of way upon street-railway tracks in the direction in which the cars usually run over vehicles going in the opposite direction, so as to entitle a bicyclist to the right of way over a vehicle approaching from the opposite direction. With this case is an extensive note on bicycle law.

*Contract.*—An agreement to furnish crushed stone "in such quantities as may be desired," to be "delivered on street" in a certain city, without making any more definite provision as to the quantity to be furnished, though made with one who has a contract for paving a street in that city, is held, in *Hoffman v. Maffioli* (Wis.) 47 L.R.A. 427, to be insufficient to bind the other party to furnish him at his option all the stone needed for paving such streets, since it does not bind him to take such quantity.

*Negligent act—Mental shock.*—A recovery for sickness due to the purely internal operation of fright caused by a negligent act is denied in *Smith v. Postal Teleg. Cable Co.* (Mass.) 47 L.R.A. 323, even if the negligence was gross and the party in fault ought to have known that the result would follow his act. But, on the other hand, physical injury resulting from fright or other mental shock caused by wrongful act or omission, is held, in *Gulf, C. & S. F. R. Co. v. Hayter* (Tex.) 47 L.R.A. 325, to be sufficient to sustain a recovery of damages, if the negligence or wrong was the proximate cause of the injury, and the injury ought, in the light of all the circumstances, to have been foreseen as a natural or probable consequence thereof.

The courts of this country appear to be doing their part toward the extirpation of lynching. Recently the Supreme Court of Ohio has affirmed the constitutionality of the act passed some time ago in that State which provided in cases of lynching that a penal remedy might be recovered. The recovery of this remedy by those having an interest in the life of the person lynched, as well as the tax rate authorized and required by the provisions of the act, are held to be within the general powers of the legislature, and not violative of the mandate of equal taxation. Nearly a dozen States of the Union already have passed acts of this character, and in every case in which the question of their constitutionality has come before a court of last resort they have been sustained. It will be remembered that by the common law mob violence can be assessed upon any region which fails to protect life and property, and the laws referred to are but an extension of the same principle.—*Albany Law Journal.*